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*Attorneys for Walmart*

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

\* \* \*

JACQUELINE FILLIS-LONGWILL, an  
individual,

Plaintiff,

vs.

WALMART ASSOCIATES, INC, a Foreign  
Corporation dba WALMART SUPERCENTER  
#2106; DOE EMPLOYEE, an individual;  
DOES II through 20X, inclusive, and ROE  
CORPORATIONS 1 through 20, inclusive,

Defendants.

Case No. 2:23-CV-00623-GMN-EJY

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY  
DEADLINES**

**(Second Request)**

IT IS HEREBY STIPULATED by and between Plaintiff JACQUELINE FILLIS-LONGWILL, by and through her counsel of record, PACIFIC WEST INJURY LAW, and Defendant WALMART ASSOCIATES, INC., by and through its counsel of record, the law firm of HALL & EVANS, LLC, that discovery in this matter shall be extended for sixty (60) days.

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### **I. REASON FOR REQUESTED CONTINUANCE**

There are a couple of circumstances at play in the present matter that warrant an extension of all deadlines for 60 days.

First, Plaintiff's expert needs additional time to finalize his report. Second, Plaintiff's counsel is preparing for a trial currently set for the beginning of March. Third, the parties are working to schedule the depositions of Walmart's 30(b)(6) witness, as well as the depositions of current and former Walmart employees. Fourth, Defendant's handling attorney is changing and additional time would allow the new attorney to get up-to-speed on the file.

The parties assure this Court that with an accommodation, they will continue to work together to diligently move this case along.

### **II. DISCOVERY COMPLETED TO DATE**

1. All parties have exchanged F.R.C.P. 26(f) Disclosures of Witnesses and Exhibits and supplements thereto;
2. Plaintiff has propounded one set of Requests for Production of Documents, one set of Requests for Admissions, and one set of Interrogatories and received responses;
3. Defendants have propounded one set of Requests for Production of Documents, Requests for Admissions, and Interrogatories and received responses; and
4. Defendants deposed Plaintiff.

### **III. DISCOVERY TO BE COMPLETED**

1. Initial expert disclosures;
2. Rebuttal expert disclosures;
3. Additional medical records collection, as necessary;
4. Potential IME;
5. Depositions of treating medical providers and expert witnesses;

6. Depositions of Walmart associates; and

7. Deposition of Walmart's 30(b)(6).

#### **IV. PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY**

Based on the foregoing, the parties agree that good cause exists to extend the discovery deadlines as follows:

	Current Deadlines	Proposed Deadlines
Close of Discovery	April 15, 2024	<b>June 14, 2024</b>
Motion to Amend/Add Parties	January 16, 2024	<b>March 18, 2024</b>
Initial Expert Disclosures	February 15, 2024	<b>April 15, 2024</b>
Rebuttal Expert Disclosures	March 18, 2024	<b>May 17, 2024</b>
Dispositive Motions	May 15, 2024	<b>July 15, 2024</b>

**V. CURRENT TRIAL DATE**

The parties request that the trial date be continued in accordance with the proposed deadlines set forth above.

DATED this 7<sup>th</sup> day of February, 2024.

**PACIFIC WEST INJURY LAW**

/s/Kirill V. Mikhaylov

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DATED this 7<sup>th</sup> day of February, 2024.

**HALL & EVANS, LLC**

/s/ Kurt R. Bonds

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**ORDER**

IT IS SO ORDERED this 8th day of February, 2024.

  
UNITED STATES MAGISTRATE JUDGE